

Recd. Rec. Mgmt. May 5, 2000

Department of Energy

Ohio Field Office West Valley Demonstration Project 10282 Rock Springs Road West Valley, NY 14171-9799

DW:2000:0348

May 5, 2000

Mr. Robert R. Campbell, President West Valley Nuclear Services Company 10282 Rock Springs Road West Valley, NY 14171-9799

ATTENTION: J. R. Gerber, Environmental Affairs Manager, AOC-24

SUBJECT: Environmental Checklist OH-WVDP-2000-03, "Fuel Receiving and Storage (FRS)

Cooling Tower Dismantlement"

REFERENCE: WD:2000:0303 (71581), J. R. Gerber to B. A. Mazurowski, "Environmental

Checklist OH-WVDP-2000-03, 'Fuel Receiving and Storage (FRS) Cooling

Tower Dismantlement," dated April 19, 2000

Dear Sir:

The Ohio Field Office West Valley Demonstration Project National Environmental Policy Act (NEPA) Compliance Officer has reviewed the subject environmental checklist and determined that the action described therein is categorically excluded from the requirement to prepare additional NEPA documentation in the form of either an Environmental Assessment or Environmental Impact Statement.

Enclosed is a signed Environmental Checklist/Action Description Memorandum Form and attachment to the Environmental Checklist.

Sincerely,

Daniel W. Sullivan

NEPA Compliance Officer

Enclosure: Environmental Checklist/Action Description Memorandum Form and Attachment

cc: J. L. Drake, OH/WVDP, WV-DOE, w/o enc.

H. R. Moore, OH/WVDP, WV-DOE, w/o enc.

DWS:091 - 71831 - 451.7

DWS/bma

Department of Energy (DOE) Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

Project/Activity Title: Fuel Receiving and Storage (FRS) Cooling Tower Dismantlement	NEPA ID Number: OH-WVDP-2000-03	Rev. #: 0	Date: 04/17/00
Contractor Project Manager: Stuart A. Giles	Phone Number: (716) 942-2382		
Contractor NEPA Coordinator: Scott C. Thompson	Phone Number: (716) 942-4181		
OH/WVDP NEPA Document Manager: Daniel W. Sullivan	Phone Number: (716) 942-4016		

- A. BRIEF PROJECT/ACTIVITY DESCRIPTION: Attach a detailed description or statement of work.
- B. SOURCES OF IMPACT: Would the action involve, generate, or result in changes to any of the following?

8000		YES	NO		YES	NO
1.	Air Emissions	X		12. Water Use/Diversion		×
2.	Liquid Effluents	×		13. Water Treatment		X
3.	Solid Waste	х		14. Water Course Modification		х
	Radioactive Waste/Soil	X		15. Radiation/Toxic Chemical Exposures	Х	
5.	Hazardous Waste		X	16. Pesticide/Herbicide Use		Х
6.	Mixed Waste		X	17. High Energy Source/Explosives		X
7.	Chemical Storage/Use		X	18. Transportation		X
8.	Petroleum Storage/Use		X	19. Noise Level	X	
9.	Asbestos	Х		20. Workforce Adjustment		Х
10.	Utilities	X		21. Other		Х
11.	Clearing or Excavation	X				

In an attachment, qualify and explain each question that you have specifically answered "YES."

C. CATEGORY EVALUATION CRITERIA: Would the proposed action:

		YES	NO
١.	Take place in an area of previous or ongoing disturbance?	Х	
2.	Create hazardous, radioactive or mixed waste for which no disposal is available?		х
3.	Impact a RCRA-regulated unit or facility?		Х
4.	Force a low income or ethnic minority population to shoulder a disproportionate share of the negative environmental impacts of pollution or environmental hazards because of a lack of political or economic strength?		x
5.	Involve air emissions and be located in an air pollutant non-attainment or maintenance area for any criteria pollutants?		x
6.	Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive Orders? (i.e., require any federal, state or local permits, approvals, etc.)?	x	
7.	Disturb hazardous substances, pollutants or contaminants that pre-exist in the environment such that there would be uncontrolled or unpermitted releases?		×
8.	Require siting, construction, or major expansion of a waste storage, disposal, recovery, or treatment facilities, including such categorically-excluded facilities?		х
9.	Adversely affect environmentally sensitive resources including, but not limited to: structures of archeological, historic or architectural significance; threatened or endangered species or their habitat; floodplains or wetlands; wildlife refuges, agricultural lands or vital water resources(e.g., sole-source aquifers)?		х
10.	Involve extraordinary circumstances? As specified at 10 CFR § 1021.410(b)(2), extraordinary circumstances are unique situations presented by specific proposed actions, such as scientific controversy about the environmental effects of the action, uncertain effects or effects involving unique or unknown risks, or unresolved conflicts concerning alternate uses of available resources within the meaning of Section 102(2)(E) of NEPA (42 U.S.C. 4332(2)).		ж
11.	Be "connected" to other actions with potentially significant impacts, related to other proposed actions with cumulatively significant impacts, and precluded by 40 CFR \$ 1506.1 or 10 CFR \$ 1021.2117		x

In an attachment, qualify and explain each question that you have specifically answered "YES."

U.S. Department of Energy (DOE) Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

n	RECOMMENDATION	AND	DETERMINATION
D.	RECOMMENDATION	ANU	DETERMINATION

DOE OH/WVDP Director's Recommendation: I find and recommend that this proposed action meets the criteria specified in 10 CFR § 1021, Subpart D, and/or DOE Policy and Guidance for the following:
<pre>[X] Categorical Exclusions (Appendix B, Class of Action B1.23) [] Actions Within the Scope of Existing NEPA Documentation</pre>
Signature: <u>Culor Q. Maxwork</u> Date <u>5-4-00</u> Director, Ohio Field Office,
West Valley Demonstration Project (OH/WVDP), Department of Energy
DOE OH/WVDP NEPA Compliance Officer's Determination: Based on my review of the attached information concerning this proposed action, as the OH/WVDP NEPA Compliance Officer (DOE Order 451.1A, Section 5.d.), I have determined that the proposed action fits within the specified class of actions, that the other regulatory requirements identified in Section C are met, and that this proposed action proceed without further NEPA review. Signature: Date May 7 2000
OH/WADE MEEN COMPITANCE Officer,
West Valley Demonstration Project
OR
<pre>[] Environmental Assessments (Appendix C, Class of Action; or Action not listed in Subpart D) [] Environmental Impact Statements (Appendix D, Class of Action) [] Interim Actions (40 CFR § 1506.1 and 10 CFR § 1021.211) [] Integrated Documentation for CERCLA/RCRA Actions [] Variances (Emergency Action, 40 CFR § 1506.11 and 10 CFR § 1021.343)</pre>
DOE-OH NEPA Compliance Officer's Concurrence: I concur with the recommendation that this proposed action fits within the specified class of actions.
Signature: Date
NEPA Compliance Officer, Ohio Field Office, Department of Energy
DOE-OH Manager's Determination: Based on my review of the attached information concerning this proposed action, as the Head of the Ohio Field Office (DOE Order 451.1A, Section 5.a.), I have determined that the level of documentation recommended for the proposed action is appropriate.
Signature: Date
Manager, Ohio Field Office, Department of Energy

A. BRIEF PROJECT/ACTIVITY DESCRIPTION:

BACKGROUND

From 1966 to 1972, Nuclear Fuel Services, Inc. (NFS), operated a nuclear fuel reprocessing plant at the Western New York Nuclear Service Center (WNYNSC) — a 3,345-acre reservation located near West Valley, New York (See Figure 1, Page 11). The WNYNSC was developed by the New York Office of Atomic Development in 1961 for establishing a commercial nuclear industry. New York leased a 220-acre parcel of the reservation to NFS for the purpose of constructing and operating the nuclear fuel reprocessing plant. As part of the lease, New York State and NFS also entered into a Waste Storage Agreement, which stipulated that the state assume responsibility for the high-level radioactive waste (HLW) storage facilities at the plant when the lease expired or was terminated (TID-28905-2, Page 1-5). The reprocessing plant, which reclaimed uranium and plutonium from spent nuclear fuel, generated approximately 600,000 gallons of liquid HLW, which was stored in underground tanks.

In 1972, NFS shut the plant down to modify and expand the reprocessing facilities in an attempt to increase plant capacity from two-to-three metric tons per day and to establish additional uranium and plutonium conversion facilities. Between 1973 and 1975, NFS accepted an additional 750 spent nuclear fuel (SNF) assemblies from several utility companies as a base load of fuel to be reprocessed. These assemblies were stored in the Fuel Receiving and Storage (FRS) pool. Irrespectively, in 1976, NFS withdrew from the reprocessing business and chose not to renew its lease with New York State, citing increasing costs and an uncertain regulatory climate as its reasons. Following a Settlement Agreement, the New York State Energy Research and Development Authority (NYSERDA) accepted surrender of the WNYNSC as well as responsibility and ownership of the reprocessing plant and HLW.

In 1980, given the inherent risks associated with long-term storage of the 600,000 gallons of HLW in the underground tanks, the United States Congress passed the West Valley Demonstration Project (WVDP) Act, directing the U.S. Department of Energy (DOE) to: (1) solidify the HLW at the WNYNSC in a form suitable for transportation and disposal; (2) develop containers for the HLW that are suitable for permanent disposal; (3) transport the solidified HLW, in accordance with applicable provisions of law, to an appropriate Federal repository for permanent disposal; (4) in accordance with applicable licensing requirements, dispose of low-level radioactive waste (LLW) and transuranic (TRU) waste produced as a result of solidifying the HLW; and (5) decontaminate and decommission - (a) the tanks and other facilities of the WNYNSC in which the HLW solidified under the Act is stored; (b) the facilities used in the solidification of the waste; and (c) any material and hardware used in connection with the WVDP, in

accordance with requirements that the Nuclear Regulatory Commission (NRC) prescribes (Public Law 96-368).

In 1981, NYSERDA advised the owners of the 750 fuel assemblies that they could no longer continue to store their fuel in the FRS pool. In 1982, NYSERDA took legal action in the U.S. District Court of New York against NFS and the owners of the fuel assemblies, alleging that they had no legal right to continue to store the fuel at the WNYNSC, since the NFS lease had expired. Moreover, during the legal proceedings, NYSERDA alleged that the fuel would hinder the WVDP. That same year, DOE issued a Final Environmental Impact Statement (EIS) and associated Record of Decision (ROD) for the actions that it proposed to fulfill the first two requirements of the WVDP Act (DOE/EIS-0081). During the first phase of the WVDP, which was completed in June 1998, the HLW was immobilized in borosilicate glass through vitrification. The canisters of immobilized HLW are currently being stored on-site until DOE authorizes their removal. In 1993 and 1998, the DOE prepared Supplement Analyses of the 1982 Final EIS to reexamine on-going HLW solidification activities as well as other refinements to the actions originally evaluated in the EIS (WVDP-EIS-025 and WVDP-321, respectively). As a result of both analyses, DOE concluded that no environmentally relevant or substantial changes in WVDP scope had occurred, that no new circumstances or relevant information existed, and that the environmental analyses performed for the 1982 EIS were still valid.

While HLW tank heel removal and vitrification remain the top priority of the DOE, the WVDP has turned its attention and shifted its resources to shipping the fuel assemblies that remain in the FRS pool to the Idaho National Environmental Engineering Laboratory (INEEL) for interim storage, pending a decision regarding permanent disposal (DOE/EIS-0203-F), as well as to satisfying the remaining requirements of the WVDP Act — waste disposal and facility decontamination and decommissioning. The DOE is currently preparing an EIS to review alternatives for satisfying these requirements (DOE/EIS-0226-D).

Nevertheless, in 1983, the U.S. District Court issued an order stipulating that the owners of the 750 fuel assemblies remove the fuel from the FRS pool or face trespassing charges and other civil penalties. Between 1983 and 1986, 625 of the assemblies were returned to their respective owners. In 1985, DOE reached an agreement with NFS regarding the remaining 125 NFS-owned assemblies — 40 Pressurized Water Reactor (PWR) SNF assemblies and 85 Boiling Water Reactor (BWR) SNF assemblies. The DOE agreed to take title of these assemblies for the purpose of carrying out a transportable storage cask demonstration project. NRC-licensed casks for each fuel type were developed in support of this project. The DOE plans to utilize these casks for shipping the 125 assemblies to the INEEL for interim storage, pending a decision regarding permanent disposal, as previously described (DOE/EIS-0203-F).

The FRS facility consists of the FRS Building, Radwaste Processing Building, and Recirculation Ventilation Building (See Figure 2, Page 12). These structures are located on the east side of the Main Plant (See Figure 3, Page 13). The FRS Building serves as a weather structure for the fuel storage pool (FSP), cask unloading pool (CUP), and associated fuel and cask handling equipment. The Radwaste Processing Building houses the shielded containers that provide temporary storage for loaded ion-exchange resin from the pool demineralizer unit. The Recirculation Ventilation Building houses the heating, ventilation and air conditioning (HVAC) system for the FRS Building (Figure 2) (WVNS-SAR-012). In 1974, as one of its plant modifications, NFS built a cooling tower unit adjacent to the FRS to control the temperature of the fuel storage pool water (Figures 2 and 3). The cooling tower unit was taken out of service in the mid-1980s, after the 625 assemblies were returned to their respective owners.

TYPE AND SCOPE OF ACTIVITY

The proposed action evaluated in this environmental checklist involves dismantling the FRS cooling tower unit, comprised of a metal building anchored to a below-grade concrete basin, and its appurtenant structures — including, but not limited to, two enclosures that house cooling unit process equipment and instrumentation. The process piping and pumps, concrete-pier pipe supports, and radiological monitoring instrumentation associated with the cooling tower unit would also be dismantled. Cooling unit equipment located inside the FRS building (e.g., piping and pumps) would not be removed as part of the proposed action.

The scope of the proposed action includes:

- · Sampling and surveying the structures to be dismantled;
- · Isolating the process equipment and instrumentation;
- Dismantling the cooling tower and its appurtenant structures;
- · Segregating and packaging the resultant debris and waste(s); and
- · Disposing of the debris and packaged waste.

PURPOSE AND NEED

The WVDP Act requires DOE to decontaminate and decommission any material and hardware used in connection with the WVDP (Public Law 96-368). The DOE utilized the cooling tower unit for approximately one year. The FRS cooling tower was operated from 1974 to 1986. The DOE took title to the 125 assemblies in 1985. The unit was taken out of

service in 1986, after the 625 assemblies had been returned to their respective owners.

SCHEDULE/TIMING

Dismantlement of the FRS cooling tower is tentatively scheduled to begin in May 2000. The dismantlement would take approximately five months to complete.

SECTION B. SOURCES OF IMPACT:

1. Air Emissions - Fugitive airborne emissions of radioactive contaminants could result from cutting the concrete basin section of the cooling tower (i.e., contaminated concrete dust). In the mid-1980s, cooling coils inside the tower froze and subsequently cracked open. When the coils cracked, contaminated pool water leaked into the cooling tower. To minimize the spread of these contaminants, a containment enclosure, equipped with a portable ventilation unit (PVU), would be placed over the contaminated portion of the cooling tower for the duration of the cutting operation.

Ambient air samplers, maintained by the WVDP Environmental Laboratory, would be used to monitor and confirm that these emissions are below environmental standards. Worker exposure to airborne radioactive contaminants would be controlled in accordance with the requirements specified in the WVDP Radiological Controls Manual (WVDP-010) and Industrial Hygiene end Safety Manual (WVDP-011) (See Section B.15. Radiation/Toxic Chemical Exposure).

2. Liquid Effluents - A water-cooled track saw would be utilized to dismantle the concrete basin. The cutting operation would utilize approximately 6.0 gallons per minute (gpm) of water to cool the saw blade (Section B.10. Utilities addresses the water and electrical supply for the cutting operation). Albeit inadvertent, the water would also suppress the amount of concrete dust generated during the cutting. A wet vacuum would be utilized, to the greatest extent practical, to collect the cooling water (See Section B.13. Water Treatment). Similarly, the depth of the basin is five feet below grade. On average, the ground-water level up gradient of the basin is roughly 15.0 feet. As such, if ground water were to infiltrate the concrete basin, e.g., through any of the cuts made while dismantling the structure, this water would have to be collected as well (See Section B.13. Water Treatment). In a similar manner, any ground water or other form of precipitation (e.g., storm water run-off) that accumulates in the unfilled earthen excavation that remains after the concrete basin has been dismantled also would be collected (See Section B.11. Clearing and Excavation).

- 3. Solid Waste Approximately 3,500 ft³ of demolition debris would result from dismantling the cooling tower unit and its appurtenant structures (approximately 2,200 ft³ of metal and 1,320 ft³ of concrete). Solid wastes generated as a result of dismantling the cooling tower would be characterized and disposed of in accordance with WV-227, "Planning for Waste Treatment, Storage and Disposal," Standard Operating Procedure (SOP) 300-07, "Waste Status Determination," and SOP 300-11, "Off-Site Transportation of Industrial Waste and Recyclable Materials." Section B.4. Radioactive Waste/Soil addresses the disposal of radioactive waste generated as a result of the proposed action.
- 4. Radioactive Waste/Soil The amount of radioactive waste generated as a result of the proposed action would be minimal (e.g., anti-Cs, gloves, wipes, and swipes). Based on waste generation rates for similar on-going operations (e.g., contact-handled waste operations in the Container Sorting and Packaging Facility), approximately 8.0 ft³/day could be generated as a result of the dismantlement activities. Cloth anti-C clothing, because it can be laundered and reused, would be used to the greatest extent possible. Radioactive waste generated as a result of the proposed action would be classified and disposed of in accordance with WV-227, WM-WCS-06, "Radioactive Waste Stream Characterization," WVDP-238, "Low-level Radioactive Waste Classification Program Plan," and the Waste Management Strategic Plan (WD:1999:0055), respectively.
- 9. Asbestos Based on a building demolition survey of the cooling tower, the structure contains approximately 7.0 linear feet of asbestos pipe insulation (12 NYCRR § 56-1.9, "Building demolition survey," Sections (a) through (e)). Prior to removing the pipe, the insulation would be removed and managed in accordance with WVDP-072, "Asbestos Management Plan," and SOP 15-44, "Asbestos Removal Minor Projects." Unless the ACM were radioactively contaminated, it would be shipped to a permitted solid waste landfill for disposal (See Section B.4. Radioactive Waste/Soil).
- 10. Utilities Utility water and electricity would be temporarily extended from existing site services [e.g., available at the FRS Building and the Contact Size Reduction Facility (Figure 2)]. The proposed action would not require any utility upgrades.
- 11. Clearing and Excavation The base of the concrete-pier pipe supports and the top two feet of the concrete-basin walls would be excavated to provide access to these structures. Based on historical knowledge of the area around the cooling tower, contaminated soil could be encountered during the excavation activities. If contaminated soil were encountered, it would be managed in accordance with WVDP-304, "Technical Basis for Contaminated Soil Management." After the concrete basin has been dismantled, the remaining earthen excavation would be backfilled with the excavated soil and spoils

- (i.e., excess fill material). After the excavation were filled, a vegetative or stone cover would be established on the ground clearing.
- 13. Water Treatment Liquid effluent(s) generated as a result of the proposed action (See Section B.2. Liquid Effluents) would be characterized and treated in accordance with WVDP-287, "Data Collection Plan for Characterization of the State Pollutant Discharge Elimination System Source Waste Streams," SOP 300-07, and SOP 300-15, "Disposition of Liquid Waste to the Interceptor." The liquid waste(s) would be disposed of through the new Low-Level Liquid Waste Treatment Facility (LLW2) or shipped off-site for disposal.
- 15. Radiation/Toxic Chemical Exposure Although individual exposures would depend on the duration of the dismantlement activities and the proximity of workers to the contaminated portion of the tower, all exposures would be maintained as low as reasonably achievable (ALARA) and in compliance with applicable state and federal regulations and DOE Orders, as implemented by WVDP-010, "Radiological Controls Manual." Worker exposure would be limited by guidance provided in the WVDP Radiological Controls Manual, WVDP Industrial Hygiene and Safety Manual (WVDP-011), and SOP 15-14, "Entry Into and Exit From Contaminated Areas." The individual dose to workers would not exceed the administrative control limits of 100 millirem (mrem)/day and 500 mrem/year (WVDP-010).
- 19. Noise Level Increased noise levels would result from the dismantlement of the FRS cooling tower. Building-demolition noise tends to be broad band and continuous. It results from cutting metal and concrete as well as operating cranes and other diesel-powered equipment. The noise levels would be of short duration and probably would not exceed 85 dB(A) TWA (decibel level measured on the A scale as a time weighted average over an eight-hour day). Applicable federal and state regulations and DOE Orders, as implemented by contractor safety procedures, would be observed during activities expected to generate elevated noise levels.

SECTION C. CATEGORY EVALUATION CRITERIA:

2. Take place in an area of previous or on-going disturbance?

The proposed action would take place in an area of previous or ongoing disturbance (Figures 2 and 3).

6. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive Orders? (i.e., require any federal, state or local permits, approvals, etc.)?

As specified in the Waste Management Strategic Plan (WD:1999:0055), an exemption from DOE Order 5820.2A¹, "Radioactive Waste Management," would be required for the WVDP to commercially dispose of any radioactive waste generated as a result of the proposed action. The WVDP currently holds such an exemption. In October 1996 and November 1997, the DOE approved 5820.2A exemptions that together provide for the shipment of 245,000 ft³ of Class A low-level radioactive waste (LLW) for commercial disposal (DW:96:1033 and DW:97:0971).

In accordance with 40 CFR § 61.145, the U.S. Environmental Protection Agency (EPA) would be notified at least ten (10) days prior to commencing the dismantlement activities (i.e., the demolition of load-bearing structural members).

SECTION D. RECOMMENDATION AND DETERMINATION:

A categorical exclusion (CX) is recommended for the proposed action. Dismantlement and subsequent disposal of the FRS cooling tower falls within the class of actions described in 10 CFR § 1021, Subpart D, Appendix B, CX B1.23, "Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces)."

There are no extraordinary circumstances related to the proposed action that would affect the significance of the action, and the action is not "connected" to other actions with potentially or cumulatively significant impacts (40 CFR § 1508.25(a)(1) and (2), respectively). Dismantling the FRS cooling tower is not an interdependent part of the EIS for WVDP completion (DOE/EIS-0226-D); that is, the proposed action does not depend on the EIS for justification. The WVDP Act requires DOE to decontaminate and decommission any material and hardware used in connection with the WVDP (Public Law 96-368), regardless of the outcome of the EIS for WVDP completion. As such, dismantling the FRS cooling tower would not prejudice the results of the EIS for WVDP completion that is, proceeding with the cooling tower dismantlement would not bias nor preclude DOE from implementing any of the EIS alternatives. Likewise, the action would not trigger other actions that require an EIS and could proceed without other actions taking place previously or simultaneously.

The U.S. Department of Energy is currently in the process of replacing DOE Order 5820.2A with DOE Order 435.1, "Radioactive Waste Management." The new order, notwithstanding, retains the exemption requirement for commercial disposal.

SUPPORTING DOCUMENTS

DOE Order 435.1	U.S. Department of Energy, "Radioactive Waste Management," dated July 9, 1999
DOE Order 451.1A	U.S. Department of Energy, "National Environmental Policy Act Compliance Program," dated June 5, 1997
DOE Order 5820.2A	U.S. Department of Energy, "Radioactive Waste Management," dated September 26, 1988
DOE/EIS-0081	U.S. Department of Energy, "Final Environmental Impact Statement: Long-Term Management of Liquid High-Level Radioactive Wastes Stored at the Western New York Nuclear Services Center, West Valley," dated June 1982
DOE/EIS-0203-F	U.S. Department of Energy, "Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement," and associated Record of Decision, as Amended, dated March 1996
DOE/EIS-0226-D	U.S. Department of Energy, "Completion of the West Valley Demonstration Project and Closure or Long-Term Management of Facilities at the Western New York Nuclear Services Center," dated March 1996
DW:96:1033	B.A. Mazurowski to W.G. Poulson, "Contract Milestone DE-AC24-81NE44139, Modification M186, Section C-12 (Page 20 of 40), 'Class A Low-Level Waste (LLW) Off-Site Shipment," dated December 9, 1996
DW:97:0971	H.R. Moore to R.R. Campbell, "Exemption to DOE Order 5820.2A for Disposal of Low-Level Waste (LLW) at Commercial Facility," dated November 10, 1997
40 CFR 61.140-156, Subpart M	U.S. Environmental Protection Agency, "National Emission Standard for Asbestos," as amended, dated February 12, 1999

40 CFR \$\$ 1500 -1508	U.S. Council on Environmental Quality, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act," dated July 1, 1986
42 U.S.C. 4321 et seq.	U.S. Congress, National Environmental Policy Act, as Amended, dated January 1, 1970
Public Law 96-368	U.S. Congress, West Valley Demonstration Project Act (S.2443), dated October 1, 1980
SOP 15-14	West Valley Nuclear Services Company, "Entry Into and Exit From Contaminated Areas," revision 16, dated February 4, 2000
SOP 15-44	West Valley Nuclear Services Company, "Asbestos Removal - Minor Projects," revision 3, dated August 30, 1999
SOP 300-07	West Valley Nuclear Services Company, "Waste Status Determination," revision 10, dated December 29, 1999
SOP 300-11	West Valley Nuclear Services Company, "Off-Site Transportation of Industrial Waste and Recyclable Material," revision 5, dated February 28, 2000
SOP 300-15	West Valley Nuclear Services Company, "Disposition of Liquid Waste to the Interceptor," revision 4, dated January 13, 2000
SOP OH-6.1.01	U.S. Department of Energy, Ohio Field Office, "National Environmental Policy Act Compliance," revision 1, dated July 7, 1995
10 CFR § 1021	U.S. Department of Energy, "National Environmental Policy Act Implementing Procedures; Final Rule," dated July 9, 1996
TID-28905-2	U.S. Department of Energy, "Western New York Nuclear Service Center Study: Companion Report," dated 1978
12 NYCRR \$ 56	State of New York, Department of Labor, "Asbestos," as amended, November 9, 1994
WD:1999:0055	M.A. Wright to B.A. Mazurowski, "Completion of Contract Milestone LL-2, 'Enhanced Waste Management Processes,' Part A (Waste Management Strategic Plan)," dated January 20, 1999

-9-

IB:2000:0100

WM-WCS-06	West Valley Nuclear Services Company, "Radioactive Waste Stream Characterization," revision 0, dated November 9, 1999
WV-227	West Valley Nuclear Services Company, "Planning for Waste Treatment, Storage and Disposal," revision 1, dated January 24, 2000
WVDP-EIS-025	U.S. Department of Energy, West Valley Demonstration Project, "Supplement Analysis of Environmental Impacts Resulting from Modifications in the West Valley Demonstration Project," dated September 7, 1993
WVDP-010	West Valley Demonstration Project, "Radiological Controls Manual," revision 15, dated November 5, 1999
WVDP-011	West Valley Demonstration Project, "WVDP Industrial Hygiene and Safety Manual," revision 15, dated June 25, 1999
WVDP-072	West Valley Nuclear Services Company, "Asbestos Management Plan," revision 5, dated October 26, 1999
WVDP-238	West Valley Nuclear Services Company, "Low- level Radioactive Waste Classification Program," revision 0, dated August 2, 1996
WVDP-287	West Valley Nuclear Services Company, "Data Collection Plan for Characterization of the State Pollutant Discharge Elimination System Source Waste Streams," revision 0, dated January 16, 1998
WVDP-304	West Valley Demonstration Project, "Technical Basis for Contaminated Soil Management," revision 1, dated March 2, 1999
WVDP-321	West Valley Demonstration Project, "Supplement Analysis II of Environmental Impacts Resulting from Modifications in the West Valley Demonstration Project," dated June 23, 1998
WVNS-SAR-012	West Valley Demonstration Project, "Safety Analysis Report for Fuel Receiving and Storage Facility," revision 2, dated March 31, 1999
IB:2000:0100	-10-

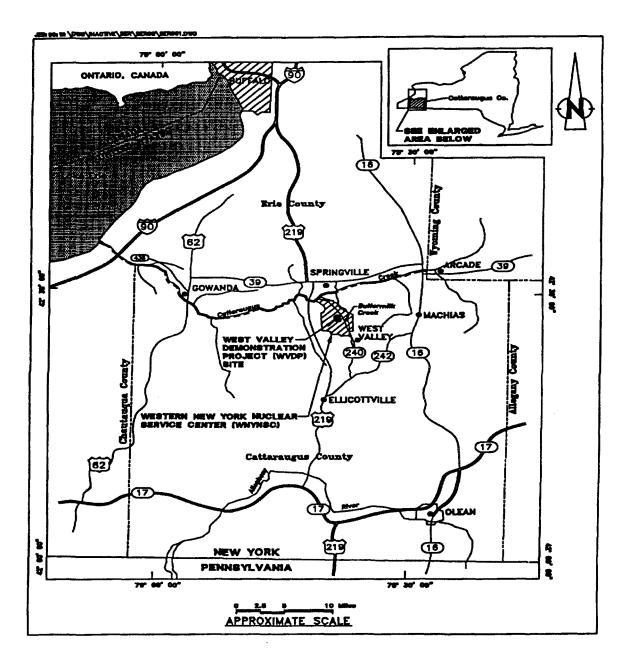


Figure 1. Western New York Nuclear Service Center (WNYNSC) and West Valley Demonstration Project (WVDP)

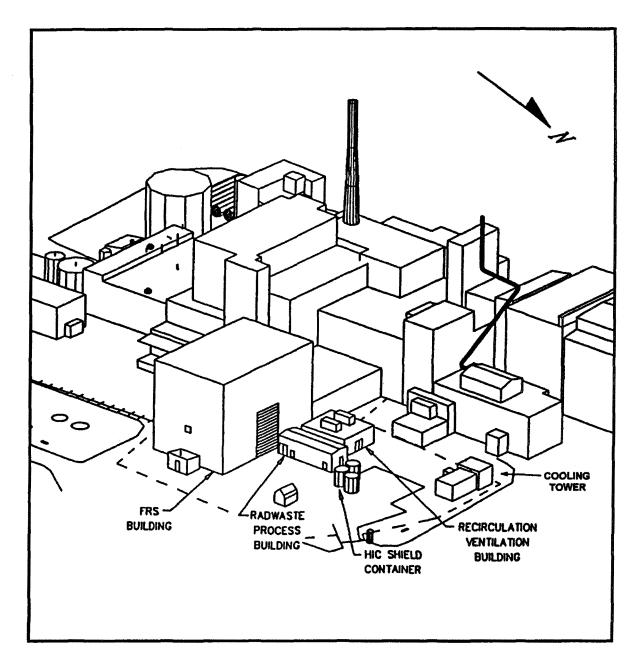


Figure 2. Location of FRS Cooling Tower (Isometric View)

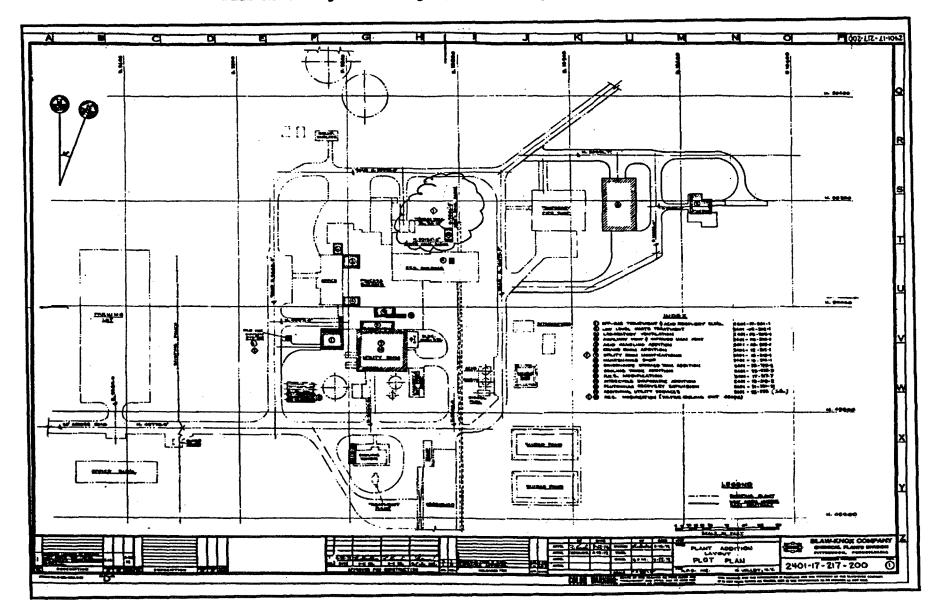


Figure 3. Location of FRS Cooling Tower (Plan View)